## UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

NEW HAMPSHIRE INDONESIAN COMMUNITY SUPPORT, et al.,

Plaintiffs,

v.

Case No. 1:25-cv-38-JL-TSM

DONALD J. TRUMP, et al.,

Defendants.

## "ASSENTED-TO" MOTION FOR A 30-DAY EXTENSION OF DEFENDANTS' RESPONSE DEADLINE TO AUGUST 27, 2025

Defendants hereby move, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Rule 7.2(a), for a further 30-day extension of their July 28, 2025 deadline to respond to Plaintiffs' Complaint, thus making their response due on or before August 27, 2025. In support thereof, Defendants state:

- 1. Plaintiffs' Complaint was filed on January 20, 2025. ECF No. 1. Plaintiffs subsequently moved for a preliminary injunction on January 21, 2025. ECF No. 24.
- 2. Plaintiffs effectuated service of their Complaint on Defendants through service on the United States Attorney's Office on January 24, 2025. *See* Fed. R. Civ. P. 4(i)(1)(A)(i)-(ii).
- 3. Thus, pursuant to Federal Rule of Civil Procedure 12(a)(2), Defendants' response to the Complaint was originally due on March 25, 2025. On March 19, Defendants filed a consent motion for extension of time to respond to the Complaint, ECF No. 92, which this Court granted on March 20, 2025. ECF No. 93. Thereafter, Defendants filed three additional assented-to motions on April 22, May 20, and June 18, 2025. ECF Nos. 97-99. Each were granted ultimately resulting in the current July 28, 2025 deadline. *Id*.

- 4. Meanwhile, on February 10, 2025, this Court issued an Order granting Plaintiffs' motion for a preliminary injunction, which enjoins the enforcement of Executive Order 14160, "Protecting the Meaning and Value of American Citizenship" ("Executive Order" or "EO"). ECF No. 77. Defendants subsequently appealed the Court's Order on April 10, 2025 to the United States Court of Appeals for the First Circuit. ECF No. 94.
- 5. There are multiple other lawsuits challenging the same Executive Order being challenged in this case, including another lawsuit pending before this same Court in which it recently granted provisional class certification and a preliminary injunction. *See "Barbara," et al.* v. *Donald J. Trump, et al.*, No. 25-cv-244-JL-AJ, Order Granting Preliminary Injunction and Provisional Class Certification, ECF No. 65. Defendants submit that, due to the relief granted in this case and litigation pending in other cases, including *Barbara*, it would not be prudent to spend time and resources responding to the Complaint at this time. Defendants therefore seek another short extension of the existing response deadline.
- 6. Pursuant to Local Rule 7.1(c), undersigned counsel for Defendants certify that they conferred with Plaintiffs' counsel in a good faith attempt to obtain concurrence in the relief requested in this motion, and Plaintiffs, through counsel, have stated that they consent to this relief.
- 7. This request is not made for purposes of delay, and no party will be prejudiced by the relief requested herein, particularly because Plaintiffs do not oppose the same. The requested extension will not result in the continuance of any hearing, conference, or trial.
- 8. Because this is an "assented-to" motion for an extension of time, no memorandum of law is necessary.
- 9. Accordingly, Defendants request a 30-day extension of the response deadline until August 27, 2025.

Dated: July 23, 2025

BRETT A. SHUMATE Assistant Attorney General Civil Division

ALEXANDER K. HAAS **Branch Director** 

BRAD P. ROSENBERG Special Counsel

s/ Kathleen C. Jacobs R. CHARLIE MERRITT KATHLEEN C. JACOBS (TX Bar No. 24091154) U.S. Department of Justice Civil Division, Federal Programs Branch 1100 L Street, NW Washington, DC 20005 Phone: 202-598-7615

Fax: 202-616-8460

Email: kathleen.c.jacobs@usdoj.gov

Attorneys for Defendants

## **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants.

Dated: July 23, 2025

/s/ Kathleen C. Jacobs
Kathleen C. Jacobs
Trial Attorney